

In The Matter Of:

*U.S. ex rel. GNGH2, Inc. vs.
XLD CENTURY LLC and XLD GROUP LLC*

*JIAQI ZHANG
December 1, 2023*

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Original File J. Zhang.txt

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A P P E A R A N C E S

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Also present with Ms. Moon - RIZ RAMJI

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I N D E X

WITNESS: JIAQI ZHANG

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INFORMATION TO BE SUPPLIED:

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(NONE)	

JIAQI ZHANG

1 JIAQI ZHANG,
2 having first been duly sworn, was
3 examined and testified as follows:
4

5 EXAMINATION

6 BY MR. ABRAMS:

7 Q. Okay. Ma'am, can you please state and spell
8 your full name for the record?

9 A. My name is Jiaqi Zhang. First name is
10 J-i-a-q-i, and last name is Z-h-a-n-g.

11 Q. Okay.

12 (Short pause taken.)

13 BY MR. ABRAMS:

14 Q. Ma'am, can you just repeat your name again, I
15 didn't quite get that?

16 A. My name is Jiaqi Zhang, and first name is
17 J-i-a-q-i and last name is spelled Z-h-a-n-g.

18 Q. Your last name is pronounced Zhang?

19 A. Yeah, that's right, Zhang.

20 Q. Zhang, I apologize, okay. 'Cause to me it
21 looks like it ought to be pronounced like Zhang, but
22 that's incorrect, right? Okay, I'm going --

23 A. That's fine.

24 Q. -- to probably not get it right.

25 And can you please tell me -- state your

JIAQI ZHANG

1 business address for the record?

2 A. It's 24 -- 2700 Foothill Boulevard, Suite 305
3 in Pasadena, California.

4 Q. Okay. And it's true you also go by the name
5 Becky sometimes; is that right?

6 A. Yeah, that's right.

7 Q. Okay. So people refer to you as --

8 A. Becky.

9 Q. -- Becky, Becky Zhang, correct?

10 A. Yeah, Becky Zhang, yeah.

11 Q. Okay. My name is David Abrams, I'm an
12 attorney, and I represent the plaintiff Relator in a
13 case which has been filed in the Central District of
14 California against XLD Group LLC and XLD Century LLC,
15 and I'm here today to ask you some questions, and the
16 first question I have for you is whether you've ever
17 been deposed before?

18 A. No.

19 Q. Okay. So let me explain to you how it works.
20 I am going to ask you a series of questions, and your
21 job is to answer them. Do you understand that?

22 A. Yeah.

23 Q. Okay. And do you understand that you're
24 under oath, and so that you have a legal obligation
25 to tell the truth today, the same as if you were

JIAQI ZHANG

1 testifying in court?

2 A. Yes.

3 Q. Okay. And do you understand the court
4 reporter is taking down everything that we say?

5 A. Yeah.

6 Q. Okay. So that way -- because of that,
7 there's two things that you need to keep in mind.
8 The first is your responses to questions have to use
9 words. In other words, you can't respond to a
10 question by shaking your head or saying uh-huh or
11 nodding or things like that. Do you understand?

12 A. Yeah.

13 Q. Okay. And the other thing is we can't both
14 speak at the same time. So if I'm in the middle of
15 asking you a question, even if you kind of know what
16 I'm about to ask you, I would ask that you wait until
17 I finish the question before you answer, and I'll try
18 not to interrupt your answer. Do you understand?

19 A. Yes.

20 Q. Okay. Now, if I ask a question that you
21 don't understand, I would ask that you tell me so,
22 and I'll try to rephrase that, okay?

23 A. Yes.

24 Q. Okay. So that way if I ask you a question
25 and you answer it, it means that you understand the

JIAQI ZHANG

1 question, and you're answering to the best of your
2 ability. Do you understand that?

3 A. Yes.

4 Q. Okay. Now, hold on one second, something
5 just popped up on my computer. I'm going to try to
6 turn it off. I know what just happened.

7 So, ma'am, are you under the influence of any
8 drugs, alcohol or medication which would affect your
9 ability to testify truthfully today?

10 A. No.

11 Q. Okay. And for the record, since this is a
12 30(b)(6) deposition, you're here on behalf of both
13 defendants; is that right?

14 A. Yes.

15 Q. Okay. So you're here on XLD Century and XLD
16 Group LLC; is that right?

17 A. That's correct.

18 Q. Okay. Fine. And what are your current
19 positions with those entities?

20 A. I'm the vice-president of XLD Group LLC, and
21 also the vice-president of XLD Century LLC.

22 Q. Okay. Are there any other vice-presidents?

23 A. Yeah, there's another one.

24 Q. And who's that?

25 A. It's Joey Zhang.

JIAQI ZHANG

1 Q. Okay. Is that person a relative of yours?

2 A. Yes.

3 Q. What's your relation to that person?

4 A. He's my sibling, my brother.

5 Q. Okay. Okay. We'll talk more about XLD Group
6 and XLD Century in a bit. But first I wanted to ask
7 you are you able to tell me your educational
8 background?

9 A. I graduated in York University in UK back in
10 2009, and I got my Master degree in Marketing
11 Management in Aston University also in UK.

12 Q. And when did you get that degree?

13 A. 2000 -- 2010.

14 Q. Okay. And what degree did you -- you got --
15 what did you get, like Bachelor's degree from York
16 University?

17 A. It's from business management.

18 Q. A business management. So what's the title
19 of that degree?

20 A. It's a Bachelor in Science.

21 Q. Okay, BS. All right.

22 A. Yeah.

23 Q. By the way, I apologize, I forgot to say
24 something which is that if at any time you need a
25 break, you should let me know, and we'll get promptly

JIAQI ZHANG

1 to a stopping point where you can take a break. The
2 only thing is if there's a question pending, I would
3 ask that you not take a break until the question's
4 been answered. Do you understand that?

5 A. Yeah.

6 MS. MOON: Counsel, what's your time
7 estimate?

8 MR. ABRAMS: It shouldn't be more than two or
9 three hours, so, you know, assuming everything goes
10 smoothly.

11 MS. MOON: Okay. If we would just like to
12 move forward without any lunch break.

13 MR. ABRAMS: Yeah, that's fine. You know,
14 we'll see how things go. I might need to take a
15 short break at some point, but I don't see this as
16 being a lengthy deposition unless there's, you know,
17 some kind of big dispute or you know. I'm sure
18 you've been around long enough that sometimes
19 surprises happen, okay?

20 MS. MOON: Sure.

21 MR. ABRAMS: All right, fine.

22 You know, by the way -- can we go off the
23 record just a second?

24 MS. MOON: Sure.

25 /

JIAQI ZHANG

1 (Whereupon a discussion was had off the
2 record.)

3 MR. ABRAMS: Back on the record.

4 BY MR. ABRAMS:

5 Q. Okay. Let me ask you, ma'am, what year did
6 you graduate high school?

7 A. I graduated high school in Wycliffe College
8 Gloucester also in the UK.

9 Q. And what year was that?

10 A. 2005.

11 Q. Okay. All right. So the -- this Wycliffe
12 College and York University in Alton (sic), the
13 language of instruction is English; is that right?

14 A. Yes.

15 Q. So it sounds to me you're quite proficient in
16 the English language; is that right?

17 A. English is my second language, and my mother
18 language is Mandarin, so I -- yeah.

19 Q. How old were you when you started learning
20 English?

21 A. Sixteen. Fifteen, sixteen.

22 Q. Okay. When you say that your first language
23 is Mandarin, you mean Mandarin Chinese?

24 A. Yes, that's right.

25 Q. Okay. And I take it did you spend your youth

JIAQI ZHANG

1 in East Asia?

2 A. Yes, like mostly in China.

3 Q. Okay. And when you say China, you mean the
4 People's Republic of China?

5 A. Yes.

6 Q. Okay. All right, fine. Now, since 2010,
7 have you been working?

8 A. 2010 I think, like, I had some intern --
9 internship in a advertisement company, and I got a
10 job in a Japanese education institution.

11 Q. Okay. Well, let me ask you this, ma'am.
12 Currently you work for XLD Group and XLD Century; is
13 that right?

14 A. Uh-huh (affirmative), yeah.

15 Q. Okay. And are there any other persons or
16 entities that you work for currently?

17 A. Yeah, yes, before that I got an internship in
18 a -- I went to a bank in China, a local bank. I
19 worked there for one year in Shanghai.

20 Q. Okay. But I'm not sure you answered my --
21 got my question right. Besides XLD Group and XLD
22 Century, do you currently work for anyone else?

23 A. No.

24 Q. Okay. And how long have you been working for
25 XLD Group and XLD -- or XLD Century?

JIAQI ZHANG

1 A. I started my job in XLD N.A. Real Estate
2 Development was in 2013, so since then, yeah.

3 Q. Okay. Well, there's XLD N.A. Real Estate
4 Development, I take it that's a company that's
5 affiliated in some way with XLD Group and XLD
6 Century?

7 A. Yes.

8 Q. Okay. What's the connection?

9 A. The XLD N.A. Real Estate states own 95
10 percent of XLD Group.

11 Q. Okay. And are you still -- do you still work
12 directly for XLD Real Estate?

13 A. Yes.

14 Q. Okay. And what's your position with that
15 entity?

16 A. Vice-president.

17 Q. Okay. Are there any other XLD entities, XLD
18 affiliated entities that you have a position with?

19 A. As the secretary -- well, I guess that's -- I
20 guess -- well, I don't remember, like, all my names
21 on, like, all the papers, but, yeah.

22 Q. I see. Okay. So, in other words, you're
23 saying that there may be other entities that are
24 related to these XLD entities that you a secretary or
25 you have some other office with, is that what you're

JIAQI ZHANG

1 saying?

2 A. Yes.

3 Q. But you're not a 100 percent sure?

4 A. Not a 100 percent sure.

5 Q. Okay. Well, hold on a second.

6 Well, is it true that there's -- that there's
7 sort of a parent company in the People's Republic of
8 China that owns all of these XLD entities?

9 A. There's a parent company in China that owns
10 XLD -- that owns XLD N.A. Real Estate Development.

11 Q. Okay. And it owns a 100 percent of it?

12 A. It owns a 100 percent of it.

13 Q. Okay. And the parent company in China, is
14 that Sichuan Singlida?

15 A. Yes.

16 Q. Is that of what it's called?

17 A. Yes.

18 Q. Okay. And that's -- that company, where is
19 it located in China?

20 A. China, Sichuan.

21 Q. Okay. So -- and so Sichuan, that's a
22 province in the People's Republic of China?

23 A. Yes.

24 Q. Okay. And just for clarity, I guess when --
25 from now on when I say China, I mean People's

JIAQI ZHANG

1 Republic of China, okay?

2 A. Yeah.

3 Q. Okay. And I apologize for that, I'm a little
4 old as you can see, and in my day, you know, we
5 talked about there was like China sometimes meant
6 Taiwan, so I just want to be clear that we're talking
7 about the People's Republic of China, okay?

8 A. Yeah.

9 Q. Okay. So let's see if I understand this. So
10 this Sichuan Singlida -- let me -- Sichuan Singlida
11 sometimes referred to as XLD Group, correct?

12 A. Well, we have, like, a lot of, like,
13 different entities, and we call it just Sichuan
14 Singlida.

15 Q. You call what? Say that again.

16 A. Sichuan Singlida. So the -- basically the
17 Sichuan XLD Singlida.

18 Q. Okay. And then the second word is Singlida;
19 is that right?

20 A. Yes.

21 Q. Okay. And that's spelled?

22 A. S-i-n-g-l-i-d-a.

23 Q. Okay. So let's see if I understand this. So
24 Sichuan Singlida is a company in China, correct?

25 A. Yes.

JIAQI ZHANG

1 Q. And it owns XLD North America Real Estate,
2 correct?

3 A. It owns XLD U.S. Top LLC.

4 Q. Okay. And XLD U.S. Top LLC owns XLD N.A.
5 Real Estate; is that right?

6 A. Yes.

7 Q. And XLD N.A. Real Estate owns XLD Group LLC
8 and XLD Century LLC; is that right?

9 A. XLD Group N.A. Real Estate owns XLD Group
10 LLC.

11 Q. Okay. 100 percent?

12 A. No, 95.

13 Q. 95. And what about XLD Century, who owns
14 that?

15 A. It's a different -- XLD Century owned by XLD
16 Investment, Inc.

17 Q. Okay. And is that a 100 percent?

18 A. It's -- XLD Century, it's 100 percent owned
19 by XLD Investment.

20 Q. Okay. Are you looking at something? Are you
21 looking at --

22 A. No, I'm trying to think. We have like
23 different shareholders, I'm trying to think which
24 layer, like, they joined and what time. XLD
25 Investment is not 100 percent owned XLD Century, it's

JIAQI ZHANG

1 like 89 percent, 80 some percent.

2 Q. Okay. And who owns -- I'm getting very
3 confused here, so let me just -- hold on a second,
4 okay?

5 A. Sure.

6 Q. Just give me a second.

7 Okay. So -- well, let me ask you this:
8 Maybe we can kind of, you know, cut -- shortcircuit
9 this a little bit.

10 Is it fair to say that the China entity, the
11 PRC entity Sichuan Singlida is ultimately the
12 majority owner of both of XLD Group LLC and XLD
13 Century LLC?

14 A. It is the parent company, like owns both XLD
15 Group.

16 Q. And XLD Century?

17 A. And XLD Century.

18 Q. Okay. It's the parent company, but it
19 doesn't -- its ultimate percentage isn't quite a 100
20 percent, right?

21 A. It does not own it directly, but it is like
22 ultimate the parent company.

23 Q. Okay. But what I want to know is this, like
24 I want to know its ultimate percentage is. Do you
25 know what I'm asking or do you want me to explain?

JIAQI ZHANG

1 A. Can you rephrase more?

2 Q. Yeah, sure. So like, for example, let's
3 suppose company A owns 50 percent of company B, and
4 then company owns 50 percent of company C, right,
5 then you would say company A ultimately owns a
6 quarter of company C. Do you understand?

7 A. Well, I think ultimately it's just like the
8 parent company is just -- it doesn't like directly
9 own, but it owns majority of the shares.

10 Q. All right. Well, let's -- you know what, I
11 guess we better go through this then, okay, just to
12 make sure I understand, I apologize.

13 So let's start again with XLD Group LLC.
14 Okay, so what entity owns the majority of XLD Group
15 LLC?

16 A. XLD Group N.A. Real Estate Development.

17 Q. Okay. And what's the percentage?

18 A. That's 95 percent.

19 Q. Okay. And what entity owns the majority of
20 XLD Group N.A. Real Estate Development, Inc.?

21 A. That's the XLD Top LLC.

22 Q. And what's that percentage?

23 A. That's 100 percent.

24 Q. Okay. And what entity owns XLD Group Top?

25 A. That's -- that's Sichuan -- that's the

JIAQI ZHANG

1 Sichuan Singlida group. I don't remember the full
2 name.

3 Q. Okay. That's the PRC entity we've been
4 talking about, though, right?

5 A. Yeah, yeah.

6 Q. And what's that percentage?

7 A. I think that's -- I'm not sure, but I think
8 it's, like, 80 percent, like 100 percent.

9 Q. Okay. So 80 to a 100 percent; is that right?

10 A. Yeah, yes.

11 Q. Okay. So let's see if I understand this. So
12 you say the PRC entities Sichuan Singlida owns 80 to
13 100 percent of XLD Top which in turn owns a 100
14 percent of XLD Group N.A. Real Estate which in turn
15 owns 95 percent of XLD Group LLC; is that right?

16 A. XLD U.S. Top.

17 Q. XLD U.S. Top?

18 A. In Canada. Yeah, XLD Group N.A. then owns
19 XLD Group.

20 Q. Okay. But besides my mistake in identifying,
21 what I just said is correct, right?

22 A. Yes.

23 Q. Okay. So that's fine. All right. So --and
24 let me ask you this: You know, we're talking about
25 how things are currently. Is that how things have

JIAQI ZHANG

1 been for the last ten years?

2 A. Sorry, can you repeat again?

3 Q. I said like -- I was asking you about the
4 ownership right now as we sit here today on December
5 1st, 2023, and I wanted to know is that what the
6 ownership relationships and percentages have been in
7 the past?

8 A. Well, we'd have to -- we'd have to look up,
9 like, our documents 'cause there's, like,
10 shareholders join in the changing, so might be
11 slightly different.

12 Q. I'm sorry.

13 A. Might be slightly different, I'm not sure
14 'cause I have to look it up.

15 Q. Oh, it might be slightly different, but it's
16 not very different; is that right?

17 A. Yeah, majority will be the same.

18 Q. Oh. So -- okay. And it's been like that for
19 the last five or ten years?

20 A. Yes.

21 Q. Okay. Okay. The entire time that you've
22 been working for XLD, for any XLD entity?

23 A. Yes.

24 Q. Okay. And you were aware of these ownership
25 relationships the whole time, even if you weren't

JIAQI ZHANG

1 aware of the exact percentages; is that right?

2 A. Yes.

3 Q. Okay. So now let's talk about XLD Century.

4 So what entity owns that?

5 A. XLD Investment, Inc.

6 Q. All right. And what's that percentage?

7 A. I think 80 some percentage.

8 Q. Okay. Okay. And who owns that?

9 A. It's U.S. Top LLC owns XLD Investment, Inc.

10 Q. U.S. Top 100 percent?

11 A. Yeah.

12 Q. Okay. And that's the same XLD U.S. Top you
13 referred to as the last set of questions?

14 A. Yes.

15 Q. Okay. Fine. And so same question, these --
16 for the most part, these relationships and
17 percentages have been in place for the last five or
18 ten years, correct?

19 A. Yes.

20 Q. Okay. And you've been aware of these
21 relationships and percentages, roughly speaking, the
22 entire time you worked for XLD; is that right?

23 A. That's correct, yes.

24 Q. Okay. And how long have you been working for
25 XLD?

JIAQI ZHANG

1 A. Since 2013.

2 Q. Okay. Okay. So just so we're clear, so the
3 whole time from -- the last ten years, you've been
4 working for various XLD entities, correct?

5 A. Yes.

6 Q. Okay. And the whole time you've been aware
7 that ultimately the main owner, ultimate owner of
8 these entities is Sichuan Singlida in the People's
9 Republic of China, right? You're nodding your head,
10 does that mean yes?

11 A. The parent company is like the same parenting
12 company, we're not changing any, yes.

13 Q. Okay. So that means yes?

14 A. Yeah.

15 Q. Okay. Now, is there someone who's like the
16 big boss, the head person at this PRC Sichuan
17 Singlida?

18 A. You mean the owner of the Sichuan Singlida?

19 Q. Yeah.

20 A. Yeah, there -- definitely, every company has
21 a boss. There's one majority owner of the Sichuan
22 Singlida.

23 Q. Right. So, you know, I'm sure you've heard
24 the phrase the big cheese, the head honcho, you've
25 heard those kind of phrases before, right?

JIAQI ZHANG

1 A. I'm not sure, what are you -- you mean
2 like --

3 Q. Okay. Let me ask you. There's usually one
4 person who's sort of the primary person in a company.

5 A. Yes.

6 Q. Okay. And I'm just wondering who's that
7 person for Sichuan Singlida?

8 A. Jun Zhang, he owns the majority share of that
9 company.

10 Q. Okay. Can you say that again?

11 A. Jun Zhang.

12 Q. I apologize, that's very difficult for me.

13 And that person has -- does that person have
14 the same last name as you?

15 A. Yes.

16 Q. Okay. Is that related?

17 A. Yes.

18 Q. I'm sorry.

19 A. He's my father.

20 Q. Okay. So it's like a family business you can
21 say?

22 A. Yes.

23 Q. Okay. And I think you mentioned your brother
24 is involved in the business as well, right?

25 A. Yes.

JIAQI ZHANG

1 Q. Okay. Are there any other family members
2 involved?

3 A. Not my knowledge, no.

4 Q. And the Chinese entity Sichuan Singlida,
5 that's a real estate company in the People's Republic
6 of China?

7 A. Yes.

8 Q. Okay, I understand. And this individual
9 Jun -- I apologize, Jun Zhang, where does he live?

10 A. He has -- he lives -- he travels a lot, so he
11 lives, like, goes back and forth. When he's in the
12 United States, he lives in his property in the United
13 States.

14 Q. I see. He's a citizen of China, though?

15 A. Yes.

16 Q. Okay. And it's fair to say he's very
17 successful; is that right?

18 MS. MOON: Objection, vague.

19 BY MR. ABRAMS:

20 Q. Whatever. You know, strike that. It's not a
21 big deal. I'm just trying to get a sense of the
22 whole picture here, but it's not a vital question.

23 So you said you were vice-president. Can you
24 tell me what your job duties are like on a day to day
25 basis.

JIAQI ZHANG

1 A. We -- our companies invest -- we purchased
2 three hotels. The purchase of two hotels here in
3 L.A., and my daily job is communicate and operate in
4 ways the management level seeing to discuss about our
5 project in our daily operations.

6 Q. Okay. And you say that there's three hotels.
7 The other one's in Puerto Rico; is that right?

8 A. Yes.

9 Q. And so just so we're clear, like XLD Century,
10 that owns the LAX Marriott; is that right?

11 A. Yes.

12 Q. And XLD Group LLC owns the Torrance Marriott;
13 is that right?

14 A. Yes.

15 Q. Okay. Now -- hold on just a second.

16 Okay. So I'm going to try to show a document
17 to you which I'll -- I guess I'm going to mark it as
18 -- I guess why don't we call it Z1.

19 A. Z1?

20 Q. Well, in English your last name seems to
21 start with a Z, so I'm just trying to keep this as
22 simple as I can. So hold on a second.

23 (Whereupon Plaintiff's Exhibit Z1, Joint Rule
24 26 Report, was marked for identification.)

25 /

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. All right. Can you see the document I'm
3 looking at?

4 A. Yes.

5 Q. Okay. And you don't need to worry about most
6 of it 'cause it's all like legal mumbo jumbo, but I'm
7 showing you page two, and you see towards the top
8 where it says "Defendant's Position"?

9 A. Yes.

10 Q. Okay. So do you see that it says, "The
11 defendants own certain Marriott hotels operated by
12 Marriott Management in California". Do you see that?

13 A. Yeah.

14 Q. Okay. So I guess is that true?

15 A. Yeah, our hotel, yes, we operate by Marriott
16 Management.

17 Q. Okay. So I just want to -- you know, we
18 don't need to go crazy on this, but I want to
19 understand. So are you -- you know, I guess what's
20 your involvement in managing the hotels if Marriott
21 is managing them? Do you understand my question?

22 A. Yeah. Yes.

23 Q. Okay. So can you explain that?

24 A. They do -- we're the ownership of the hotels.

25 Q. Okay.

JIAQI ZHANG

1 A. So basically we have management agreement
2 with the Marriott Management Team. So they do daily
3 operations, but from XLD, we invest the money, we
4 have to be responsible for our shareholders, and
5 that's why we very -- we communicate very closely
6 with the high level management team weekly. So we
7 have phone calls with them, you know, we go to
8 properties, and we discuss about budgets,
9 renovations, and the performance basically on a very
10 like weekly, daily basis.

11 Q. I see. So is it fair to say that both of the
12 defendants in this matter have signed, like, standard
13 management agreements with Marriott Hotel Services?

14 A. Yes, that's correct.

15 Q. Okay. And you know I don't -- you know, I
16 don't have those agreements, and it's probably not
17 that important for this case, but I just want to make
18 sure I understand the relationship here. So hold on
19 a second, let me just see.

20 Marriott's a publicly traded company, right?

21 A. Yes.

22 Q. Okay. So you -- probably their management
23 agreements are available. I mean I guess -- let me
24 skip to the next topic, I don't want to get too
25 sidetracked. Let me ask you this:

JIAQI ZHANG

1 So did there come a time when both of the
2 defendants in this matter apply for second-round PPP
3 disaster relief?

4 A. Can you repeat again?

5 Q. Did there come a time when the defendants in
6 this matter applied for second-round PPP disaster
7 relief?

8 MS. MOON: Kind of vague did there come a
9 time. Are you trying to say that did the companies
10 request the relief?

11 BY MR. ABRAMS:

12 Q. Ma'am, do you not understand my question?

13 A. Not -- not very clearly.

14 Q. Okay. Well, let me put it a different way.
15 Let's start with -- hold on a second.

16 Let me ask you this, ma'am. Do you know what
17 this lawsuit is about?

18 A. Yes.

19 Q. And to your understanding, what's this
20 lawsuit about?

21 MS. MOON: Objection, that's not calculated
22 to lead to admissible evidence, and it calls for
23 legal conclusion. To the extent that you're asking
24 her her understanding of the legal positions, I'm
25 going to instruct her not to answer.

JIAQI ZHANG

1 And what are you trying to say? What does
2 her understanding of this lawsuit have anything to do
3 with it? Can you be more specific?

4 MR. ABRAMS: Well, you know, look, the thing
5 is this. It's reasonable question. I'm not going
6 to, like, make a big fight over this, but, you know,
7 Rule 30 is the same everywhere. You know, your
8 objections, the scope of objections is very limited,
9 and what you've done is you've gone beyond the scope
10 of reasonable objections.

11 And, you know, if this keeps up, we're going
12 to have a big problem, I'll tell you that right now.
13 So I'm going to move on to another question, but I'll
14 tell you right now that these kind of objections are
15 not appropriate.

16 MS. MOON: Well, that's not your decision,
17 it's the court's decision.

18 MR. ABRAMS: That's right, it will be the
19 court's decision.

20 BY MR. ABRAMS:

21 Q. Okay. Ma'am, did defendant XLD Group LLC
22 ever apply for second-round PPP disaster relief?

23 A. Yes.

24 Q. Okay. And are you the one who applied for
25 that relief on behalf of XLD Group LLC?

JIAQI ZHANG

1 A. Well, I -- our group, like, withdrew the
2 numbers and steps, yes.

3 Q. Okay. And same questions for defendant XLD
4 Century LLC, did XLD Century LLC apply for
5 second-round PPP disaster relief?

6 A. Yes.

7 Q. Okay. And are you the one who applied for
8 second-round PPP disaster relief on behalf of that
9 entity?

10 A. Same, I went through all the steps, and on
11 behalf of XLD Century, I applied.

12 Q. Okay. And when you say you went through all
13 the steps, that meant filling out forms on a
14 computer; is that right?

15 A. Yes.

16 Q. Okay. So I'm going to show you a couple
17 documents. So first, I'm going to show you what's
18 been marked as -- what I'm going to mark as Z2.

19 (Whereupon Plaintiff's Exhibit Z2, PPP
20 application for XLD Group LLC, was
21 identification.)

22 BY MR. ABRAMS:

23 Q. All right. Can you see that?

24 A. Yes.

25 Q. Okay. And it's a four page document, and you

The parties agree that "withdrew" in Line 1 should be "went through" as set forth in the errata sheet.

JIAQI ZHANG

1 see at the top it says "Paycheck Protection Program
2 Second Draw Borrower Application Form"?

3 MS. MOON: Counsel, we don't see the four
4 page obviously, we only see a little portion of a
5 tiny little section. So we don't see top or bottom
6 or any four pages really.

7 MR. ABRAMS: Okay. This is -- I mean if you
8 want, I'll e-mail it to you so she can look at the
9 whole thing if she wants or it's part of your
10 document production.

11 MS. MOON: You're just making -- oh, it's XLD
12 00 -- 001. I can get that.

13 MR. ABRAMS: It's 01 through 04. So if you
14 want to pull it up yourself and look at the whole
15 thing.

16 THE WITNESS: Yeah, we have --

17 MS. MOON: Okay, let me pull it up. I got
18 it. XLD 001 through 004, I got it. So you can let
19 go of that shared screen, it's not working. It's
20 only giving us portion. Okay, so we got the document
21 right here.

22 BY MR. ABRAMS:

23 Q. So, ma'am, do you understand that this is a
24 set of documents that was produced by your attorney's
25 in this matter?

JIAQI ZHANG

1 A. Yeah.

2 Q. Okay. And you see at the top it says
3 "Paycheck Protection Program Second Draw Borrower
4 Application Form"?

5 A. Yes.

6 Q. Okay. And you see under Primary Contact it
7 says Jiaqi Zhang?

8 MS. MOON: Where does it say that? Say
9 where?

10 MR. ABRAMS: On the first page in the upper
11 right-hand corner about three lines down, do you see
12 sit says Primary Contact.

13 A. The Primary Contact, yes.

14 MS. MOON: Oh, primary contact, okay.

15 BY MR. ABRAMS:

16 Q. All right. And that's your name; is that
17 right?

18 A. That's right.

19 Q. All right. And then you see it says e-mail
20 address?

21 A. Yeah, that's my e-mail address.

22 Q. Okay. So is this a form that you completed,
23 ma'am?

24 A. I think I complete this form with my -- my
25 team, and I'm not quite sure.

JIAQI ZHANG

1 Q. Okay. Well, let me ask you this: Was this
2 completed online?

3 A. Yes.

4 Q. Okay. And so I want you to look on the
5 fourth page. Actually on the third page. Do you see
6 there's a whole series of lines, and it says "JZ"
7 next to each of those little statements?

8 A. Yes.

9 Q. Okay. And so isn't it true that you had to
10 essentially initial next to each of those stations --

11 A. Yes.

12 Q. -- when you were completing the form?

13 A. Yes.

14 Q. Okay. And that was done online, right?

15 A. Yes.

16 Q. Okay. And you see, like, your initials
17 appeared next to -- well, do you see where it says,
18 "The authorized representative of the applicant must
19 certify in good faith to all of the below by
20 initialing next to each one." Do you see that?

21 A. Yes.

22 Q. Okay. And you, in fact, initialed next each
23 of these statements, correct?

24 A. Yes.

25 Q. All right. Why did you do that?

The parties agree that "stations" in Line 10 should be "statements" as set forth in the errata sheet.

JIAQI ZHANG

1 A. Why did I do that? What do you mean?

2 Q. Well, why did you put your initials next to
3 each statement?

4 A. So I read it, and I checked it and so I put
5 my initials, I confirmed.

6 Q. Okay. All right. And then you submitted
7 this form, correct?

8 A. Yes.

9 Q. All right. And you submitted this form in
10 order to get the \$2 million in disaster relief,
11 correct?

12 A. Yes.

13 Q. And you did get the \$2 million in disaster
14 relief; is that right?

15 A. Yes.

16 Q. And when I say you, I mean your company,
17 right?

18 A. Yeah.

19 Q. Okay. And that those -- that money was
20 eventually forgiven, right?

21 A. Yes.

22 Q. Okay. Now, you see on page four the initial
23 statement, the second from the top where -- you want
24 me to read it to you or do you see what I'm talking
25 about, the one that refers to the People's Republic

JIAQI ZHANG

1 of China, do you see that one?

2 A. Yes, I see that one.

3 Q. Okay. So now did you read that before you
4 initialed it?

5 A. Yes.

6 Q. Okay. And did you understand it?

7 A. Yeah.

8 Q. Okay. And what did you understand it to
9 mean?

10 A. That the applicant, which is XLD Group, it's
11 not an entity created or organized under the law of
12 the People's Republic of China or Hong Kong, and we
13 -- XLD Group or XLD Century, we don't have
14 significant operation in China or Hong Kong, and we
15 don't own or host directly or indirectly not less
16 than 20 percent of the interest.

17 And I understand, like, we don't have member
18 of the business or any person who is like a resident
19 of People's Republic of China, yeah. Well, we don't
20 have any member or of the board.

21 MS. MOON: Of the --

22 THE WITNESS: Of the board or directors of
23 the business concern or like who -- who is like the
24 resident of the People's Republic of China.

25 /

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. Well, let me ask you this: I'm going to look
3 at it. So you see it says, "The applicant is not a
4 business concern or entity"?

5 A. Uh-huh (affirmative).

6 Q. "For which an entity created in or organized
7 under the People's laws -- the laws of the People's
8 Republic of China or Hong Kong or" -- I'm sorry, let
9 me finish my question, ma'am.

10 Do you see it says, "for which an entity,"
11 and then there's some stuff about China. Then says,
12 "owns or holds directly or indirectly not less than
13 20 percent of the economic interest of the business
14 concern or entity." Do you see that?

15 A. Yes.

16 Q. Okay. So isn't that saying that you're
17 certifying that the applicant is not an entity for
18 which a PRC company has ownership interest?

19 A. It is what it says here.

20 MS. MOON: She already told you her
21 understanding.

22 MR. ABRAMS: Okay. Look, I'm allowed to ask
23 her questions. This is very important, and I'm
24 allowed to do it, and I'd appreciate it if you didn't
25 say anything suggestive. Okay, you're trying to

JIAQI ZHANG

1 suggest to her how she should respond, and I really
2 don't appreciate it.

3 MS. MOON: How is that a suggestion?

4 MR. ABRAMS: I'm not going to argue.

5 BY MR. ABRAMS:

6 Q. Ma'am, let me ask you this: We agreed that
7 Sichuan Singlida indirectly owns more than 20 percent
8 of the economic interest of XLD Group LLC, right?

9 A. XLD Sichuan Singlida is the parent company,
10 yes, but indirectly, yes.

11 Q. Right. So it says -- let me ask you this:
12 In the first clause where it says "business concern
13 or entity" you see that, right?

14 A. Uh-huh (affirmative).

15 Q. Do you see that?

16 A. Yes.

17 Q. Okay. And so you understand that business
18 concern or entity refers to the applicant, refers to
19 XLD Group LLC, right?

20 A. Yes.

21 Q. Okay. And then you see a couple lines down,
22 it says, "not less than 20 percent of the economic
23 interest of the business concern or entity." Do you
24 see that?

25 A. Yes.

JIAQI ZHANG

1 Q. Okay. So you understand that's talking about
2 ownership of XLD Group LLC, correct?

3 A. Yeah.

4 Q. Okay. So the certification is saying that
5 there's no PRC company that owns more than 20 percent
6 of the economic interest of XLD Group LLC, right?

7 A. No.

8 Q. Doesn't mean that to you?

9 A. No, that's not what I see from this phrase.

10 Q. As you sit here today, that's not your
11 interpretation of this language, correct?

12 ~~A. What's that? Can you repeat again?~~

13 Q. As we sit here today, you're confident that
14 this language is not referring to the ownership of
15 the applicant? It's not referring to entities that
16 own the applicant, correct?

17 A. Correct.

18 Q. Okay. And if it were referring to that, then
19 -- if it were referring to the ownership of the
20 applicant, then you couldn't have honestly initialed
21 that, right?

22 A. Can you say it again?

23 Q. I said if this language is referring to the
24 ownership of the applicant, of the ownership of the
25 XLD Group LLC, then you could not have honestly

JIAQI ZHANG

1 certified to this representation, correct?

2 A. It's talking about whether XLD owns a company
3 in China.

4 Q. All right. But assuming for the sake of
5 discussion, and I know you interpret this language
6 differently, but assuming that it's referring to the
7 ownership of XLD Group LLC, and not what is owned by
8 XLD Group LLC, then you would not have been able to
9 accurately certify to this representation, correct?

10 A. Well, I don't -- I don't -- I don't know why
11 -- why -- what do you mean?

12 Q. You're not able to understand my question,
13 ma'am?

14 A. I think your question's like -- I don't
15 understand.

16 Q. You don't understand. Well, let me ask you
17 this, ma'am. How old were you when you started
18 reading English?

19 A. Sixteen.

20 Q. Sixteen? And would you say you have good
21 English comprehension skills?

22 A. For basics, yes.

23 Q. For basic? What would you say your
24 comprehension skills are good enough to understand
25 this entire application?

JIAQI ZHANG

1 A. Well, I don't think so, I have, like, how do
2 you define that? Yeah. I thought I did.

3 Q. Well, I'm asking you what you think now. Do
4 you think that -- as we sit here today, do you think
5 your English skills are good enough to understand
6 this application form?

7 A. I -- I already said, like, what I understand.
8 I --

9 Q. All right. And I'm asking you if you believe
10 that your English skills are good enough to
11 understand this form?

12 A. I thought I did, I thought I understand this.

13 Q. Okay. Well, as we sit here today, do you
14 think that you understand this?

15 A. Yes.

16 Q. Okay. So the answer's yes, so you do think
17 your English is good enough to understand this form?

18 A. I think I understand it, but I feel like
19 you're saying like I didn't.

20 Q. Well, I'm asking you, ma'am, okay? I'm
21 asking you if your English -- if your English
22 skills -- as we sit here today, if you believe your
23 English skills are good enough to understand this
24 form? It's a simple yes or no question.

25 A. Yes.

JIAQI ZHANG

1 Q. Okay. And you believe the same thing when
2 you completed the form in 2021, right?

3 A. Yeah, I understood the language like as I
4 told you already.

5 Q. Okay. And there was no doubt in your mind
6 that your interpretation was correct, right?

7 A. What do you mean?

8 Q. Like when you completed the form --

9 A. Yeah.

10 Q. -- you were confident that your
11 interpretation of the form was correct?

12 A. Yeah.

13 Q. Okay. And -- but you saw this about the
14 People's Republic of China, right?

15 A. Huh?

16 Q. Yes?

17 A. Can you say it again?

18 Q. You saw language about the People's Republic
19 of China, correct?

20 A. Yes. Yes.

21 Q. And you knew that the applicant XLD Group LLC
22 was connected in some way to the People's Republic of
23 China, right?

24 A. Well, it just talk about like XLD owns a
25 company in China, that's what I --

JIAQI ZHANG

1 Q. Okay. So, yes, but my question is you knew
2 at the time that there was some kind of connection
3 between XLD Group LLC and the Chinese company, right?

4 A. Yeah, I did talking about whether XLD owns a
5 company in China.

6 Q. Okay. Well, that's not my question. My
7 question is at the time, you knew that there was a
8 connection between XLD Group LLC and a company in the
9 People's Republic of China? Did you -- you were
10 aware of that, right?

11 A. I'm aware there's the Republic -- yeah,
12 there's a connection.

13 Q. Okay. Now let me ask you this: Did you --
14 before completing this form, did you consult with
15 anyone?

16 A. With this form? This is -- no, this is just
17 like our team.

18 Q. Well, did you talk to anyone about the form
19 before you completed it and submitted it?

20 A. I submit this form specification.

21 Q. Does that mean yes or no, ma'am?

22 A. No.

23 Q. Okay. So you didn't consult with anyone?

24 A. No, we -- no.

25 Q. Okay.

JIAQI ZHANG

1 A. It's just our team, like, when we get some
2 numbers.

3 Q. Well, when you talk about a team, who is on
4 the team?

5 A. Our accountant, our in-house accountant that
6 prepared the numbers in a financial supporting
7 documents.

8 Q. Okay. And what's that person's name?

9 A. Jack Chen, J-a-c-k, last name C-h-e-n.

10 Q. Okay. Anyone else?

11 A. No.

12 Q. Okay. And you say you discussed the numbers
13 with him, did you discuss this form with him in any
14 way?

15 MS. MOON: Which part?

16 THE WITNESS: It's -- we needed to, like,
17 prepare, like, some numbers, and so we discussed this
18 application, but --

19 BY MR. ABRAMS:

20 Q. Let me ask you this: Did you discuss this
21 part about the People's Republic of China with him?

22 A. No, I think I understand it's like -- I can
23 finish this form by myself.

24 Q. Okay. Well, let me ask you this: On the
25 first page you see where it says to -- well, actually

JIAQI ZHANG

1 hold on a second before I get into that, let me ask
2 you this:

3 So you actually filled out more than one of
4 these forms, right? You filled out one for XLD Group
5 LLC and one for XLD Century LLC, right?

6 A. Yes.

7 Q. All right, hold on a second. Let me get the
8 one for XLD Century.

9 MS. MOON: Do you have a question pending?
10 Can we take a break?

11 MR. ABRAMS: Now's a fine time to take a
12 break. How long do you need?

13 MS. MOON: Ten minutes.

14 MR. ABRAMS: I mean if you want to take a ten
15 minute break, that's fine with me. We'll resume at
16 2:07 p.m. Eastern time which is -- I don't know what
17 that is.

18 MS. MOON: Eleven.

19 MR. ABRAMS: 11:07, 11:07 Pacific time, okay?

20 MS. MOON: Okay. We'll talk to you later.

21 (Whereupon a short break was taken.)

22 BY MR. ABRAMS:

23 Q. All right, ma'am, now that you've had a ten
24 minute break and a chance to confer with your
25 counsel, is there any testimony you've given that you

JIAQI ZHANG

1 want to correct or change in any way?

2 A. No.

3 Q. Okay. So and I can't remember -- you know,
4 before we move on, I just want to confirm. So
5 Exhibit 2, that's a document that you completed and
6 submitted in order to get second draw Paycheck
7 Protection Program monies; is that correct?

8 A. Yeah. Yes.

9 Q. Okay. On behalf of XLD Group LLC?

10 A. Yes.

11 Q. Okay. So I'm going -- I guess I'll e-mail
12 you the similar form for XLD Century.

13 (Whereupon Plaintiff's Exhibit 2, PPP
14 Application for XLD Group, LLC was marked for
15 identification.)

16 MR. ABRAMS: So, Attorney Moon, do you want
17 me to e-mail that to you?

18 MS. MOON: Okay.

19 MR. ABRAMS: I mean I can screen share it,
20 but it seems like you're not --

21 MS. MOON: Because the exhibit -- I think
22 it's the same other than the numbers, and you're not
23 going to ask about numbers. So I think it's the
24 same, just share screen.

25 MR. ABRAMS: Okay, I will try.

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. So I'm going to show you -- hold on.

3 Okay. So do you see the document, ma'am?

4 A. Yes.

5 Q. Okay. And it's a four page document. Do you
6 want me to scroll through it, so you can see it all?

7 MS. MOON: Just show us the portion where
8 you're going to ask questions on 'cause, you know,
9 you can't really --

10 MR. ABRAMS: Well, I have a question about
11 the entire document.

12 MS. MOON: Okay.

13 BY MR. ABRAMS:

14 Q. So the question is this: Is this the form
15 that you completed and submitted in order to get
16 second draw Paycheck Protection Program monies for
17 XLD Century LLC?

18 A. Yes.

19 Q. Okay. And you signed this form
20 electronically?

21 A. Yes.

22 Q. And you signed the other form electronically,
23 the one we talked about be a minute ago?

24 A. Well, I -- yes, I signed it through their
25 online portal, but I don't recall, like -- I tried

JIAQI ZHANG

1 looking for the signed copy, but I couldn't find it.
2 You know, I you don't -- I don't recall whether I
3 signed or not.

4 Q. Okay. Well, you submitted it through their
5 online portal, right?

6 A. Yeah.

7 Q. And that asked for some kind of electronic
8 signature or confirmation or something like this,
9 correct?

10 A. No.

11 Q. It didn't?

12 A. No.

13 Q. So you're testifying -- let's just make sure
14 I understand this. You applied for second-round PPP
15 monies on behalf of XLD Century LLC and XLD Group
16 LLC, correct?

17 A. Can you repeat again?

18 Q. You applied for -- I'm going to say PPP
19 instead of Paycheck Protection Program. You applied
20 for PPP monies for XLD Century LLC and XLD Group LLC,
21 correct?

22 A. Yeah.

23 Q. Okay. You're looking at your attorney, and
24 I'm going to admonish you if you don't know how to
25 answer a question, your attorney's not allowed to

JIAQI ZHANG

1 help you in any way, do you understand that?

2 A. I can look whatever direction I want to.

3 Q. Okay. All right. You know, look, I'm going
4 to ask that you turn the camera so that I can see
5 both of you. Would you please do that?

6 MR. ABRAMS: Because the thing is this:
7 Ms. Moon, you know perfectly well that if she looks
8 for you for help, you can't help her?

9 MS. MOON: Excuse me.

10 MR. ABRAMS: I'm just saying that.

11 MS. MOON: Harass her and make her -- be rude
12 like this. You do a better job, counsel. That's
13 ridiculous for you -- just because she turned her
14 head toward me, for you to go to this length, it's
15 rude.

16 MR. ABRAMS: All right.

17 BY MR. ABRAMS:

18 Q. So, ma'am, you applied for second-round PPP
19 relief for XLD Century LLC and XLD Group LLC; is that
20 right?

21 A. Yes.

22 Q. Okay. And you did that online, correct?

23 A. Yes.

24 Q. And you completed forms online to do that,
25 correct?

JIAQI ZHANG

1 A. Yes.

2 Q. All right. And you're saying that -- you
3 deny that the system required you to provide any kind
4 of electronic signature for these forms, is what
5 you're testifying to?

6 A. Well, I don't recall whether I signed or not
7 'cause I tried to looking for signed copies, and I
8 couldn't find it.

9 Q. Okay. So the answer is you don't remember;
10 is that right?

11 A. Yeah, I don't remember.

12 Q. Okay. But if the bank were to testify that
13 you had to electronically sign the documents in order
14 to get the money, you wouldn't dispute that, would
15 you?

16 A. Sure, yeah.

17 Q. You would dispute it?

18 A. Well, I don't remember if I signed it or not.

19 Q. Okay. I'm just asking you if the bank -- if
20 a representative of the bank were to testify that you
21 had to actually electronically sign the documents in
22 order to get the money, would you dispute that
23 testimony?

24 A. I don't remember.

25 Q. You don't -- so you're saying -- you said you

JIAQI ZHANG

1 don't know if you would or you wouldn't?

2 MS. MOON: Can you just move on from this?

3 What point are you going to make? I mean --

4 BY MR. ABRAMS:

5 Q. Are you able to answer my question, ma'am?

6 A. I think that -- well, see like -- it's like
7 really depends if -- it really depends like whether
8 they have my signed pages or not, right?

9 Q. Well, do you see at the bottom of this form,
10 ma'am, it says "Signature of Authorized Person", and
11 then it's printed. Your name is printed there, do
12 you see that?

13 A. Uh-huh (affirmative).

14 Q. Do you see that, ma'am?

15 A. Yes, yes.

16 Q. Okay. So do you know how those words got
17 there on that form?

18 A. I don't recall.

19 Q. You don't know. Let me ask you this: So the
20 same set of questions about this form as the other in
21 terms of initialing it and so on. If I ask you those
22 questions for this form that it did for the previous
23 exhibit, would you give the same answers?

24 A. Can you say again?

25 Q. Do you recall I asked you a set of questions

JIAQI ZHANG

1 about Exhibit 2 that the application form for XLD
2 Group LLC, do you remember that set of questions?

3 A. Yes, yes.

4 Q. Okay. And if I were to ask you the same set
5 of questions about this form, would you give the same
6 set of answers?

7 A. Yes.

8 Q. Okay. And in particular, on page -- on the
9 -- do you see the certification?

10 A. Yes.

11 Q. For -- that relates to the People's Republic
12 of China?

13 A. Uh-huh (affirmative). You mean the second
14 paragraph?

15 Q. Yep, on page four, do you see that?

16 A. Yes.

17 Q. Okay. And so as we sit here today, you're
18 confident that what that means is the applicant can't
19 have a subsidiary which operates or is registered in
20 the People's Republic of China, correct?

21 A. Yes.

22 Q. Okay. And that's what you believed at the
23 time?

24 A. Uh-huh (affirmative).

25 Q. Yes?

JIAQI ZHANG

1 A. Right.

2 Q. And there's no doubt if your mind about that
3 fact?

4 A. No.

5 Q. None?

6 A. No, I -- I understand that there's -- yeah,
7 we're not applied -- that those are not applied to
8 us.

9 Q. Okay. Now, let me ask you this: You aren't
10 -- did you ever try to conceal from the lender the
11 fact that either of these defendants, either of these
12 entities were ultimately owned by an entity in the
13 People's Republic of China?

14 A. No.

15 Q. Okay. Let me ask you this: Let's go back to
16 Exhibit 2.

17 MS. MOON: The application form you mean
18 for --

19 MR. ABRAMS: Yeah, there's two XLD the XLD
20 Group application form. Hold on a second, I need to
21 pull it up myself.

22 BY MR. ABRAMS:

23 Q. Okay. So you see on page one, it says, "List
24 all owners of 20 percent or more of the equity of the
25 applicant"?

JIAQI ZHANG

1 MS. MOON: I'm sorry, where?

2 MR. ABRAMS: On page one of Exhibit 2, that's
3 the application form for XLD Group LLC.

4 THE WITNESS: Yeah.

5 BY MR. ABRAMS:

6 Q. Okay. You see it says to list all owners of
7 20 percent or more, right?

8 A. Uh-huh (affirmative).

9 Q. And you see it says your name, and it says
10 that you own a 100 percent. Do you see that?

11 A. Yeah. Yes.

12 Q. That's never been true, has it?

13 A. I don't -- I didn't fill this form, like this
14 form comes out -- this form comes out, it's like
15 electronically.

16 Q. All right. So you're saying you don't know
17 who put that information in?

18 A. Well, I don't -- I don't know.

19 Q. Okay. Is there anyone with XLD Group who was
20 involved in completing the applications with the
21 computer for second-round PPP?

22 A. Let's just -- I told you, just me and my
23 accountant.

24 Q. And your what?

25 A. Our accountant in-house Jack Chen, I believe

JIAQI ZHANG

1 I gave the name earlier.

2 Q. Okay. So you did more than consult with him,
3 he actually completed the form online?

4 A. I completed the form, and I need the numbers
5 supporting, and we were just work together through
6 the whole program.

7 Q. Okay. But did he access the computer system
8 to complete the application form for second-round PPP
9 at all?

10 A. Does it matter?

11 Q. Ma'am, are you able to answer my question?

12 A. I would just, like, go through the
13 application form, and Jack will -- like he's
14 responsible for the numbers.

15 Q. Okay. My question, ma'am, did -- when you
16 completed the application form, you did it from a
17 computer, correct?

18 A. Yes.

19 Q. And that computer is located at the office of
20 XLD Group LLC on Foothill Boulevard, right?

21 A. Yes.

22 Q. And was that the only computer that was used
23 to apply for the second-round PPP or were there other
24 computers involved with that?

25 A. Well, I don't remember, but I think the

JIAQI ZHANG

1 section Jack helped me complete this, and I finished
2 the rest of it.

3 Q. Okay. So when you said he helped you
4 complete it, was he standing there and/or sitting
5 there with you while you filled the information in?

6 A. Yes.

7 Q. Okay. So you're both doing it together; is
8 that right?

9 A. Yes.

10 Q. Okay. So you see this bit about you owning a
11 100 percent, correct?

12 A. Yes.

13 Q. And that's never been true, correct?

14 A. That's not.

15 Q. Okay. Do you know why that information was
16 put in if it was not true?

17 A. I don't know.

18 Q. Did you put it in or did Jack put it in?

19 A. No.

20 Q. I'm sorry?

21 A. No. We didn't.

22 Q. Neither of you put it in?

23 A. No.

24 Q. Okay. Do you know how it got there?

25 A. I don't know.

JIAQI ZHANG

1 Q. Okay. And the second line where it says "XLD
2 Group N.A. Real Estate Development, Inc. owner 95
3 percent," did you put that in, did Jack put that in,
4 did someone else put that in?

5 A. We didn't fill this form -- this form doesn't
6 look like the same, so I don't know how this form
7 comes out. We give them, like, information, and -- I
8 can't see like XLD. Yeah.

9 Q. I'm sorry, when you say we give them
10 information, who's the "them"?

11 A. Me and Jack.

12 Q. So you gave information to you and Jack?

13 MS. MOON: He's asking you who did you give
14 -- you said "I gave them information". He's asking
15 you who is them?

16 THE WITNESS: Oh, the bank PPP application.
17 BY MR. ABRAMS:

18 Q. Okay. So are you testifying that the bank
19 completed this part of the form for you?

20 A. The system. I mean the online system, it
21 comes out -- the form is like not the form like with
22 you the first time. We didn't put like I own 100
23 percent owner of XLD Group. Why would I, I'm not an
24 owner.

25 Q. Okay. Is it your testimony that you have no

JIAQI ZHANG

1 idea where this information came from?

2 A. I have no idea why this come -- this
3 information showed like I own a 100 percent, doesn't
4 make sense, right? You add up all the percentage,
5 it's like -- it's like way off.

6 Q. Okay. But you know that neither you nor Jack
7 put that in, correct?

8 A. We know the structures, we know the shares,
9 we know the number of the shares, and we know the
10 shareholders. That's the information we provide to
11 the online -- through the online portal, but the form
12 you saw and we saw is like I don't know why my name
13 is showing as title as owner, that's -- that's the
14 thing, I don't know, I don't know why this happened.

15 Q. Okay. So that's not information that you put
16 in, correct?

17 A. No.

18 Q. And you don't know who put that in, correct?

19 A. No, I don't know.

20 Q. Okay. All right. So let's turn to -- it
21 says, "XLD Group N.A. Real Estate Development, Inc.
22 owner 95 percent," but was that true at the time?

23 A. Yeah.

24 Q. Okay. And did you put that in?

25 A. Well, I knew -- you mean like I filled in,

JIAQI ZHANG

1 like in the form or what do you mean? I'm telling
2 you that I know like the structure is. I saw the
3 Group N.A. owns 95 percent, and the Grand Tripod owns
4 five percent, that's my understanding. But why this
5 form comes out like this, has four lines, I don't
6 understand, I don't know.

7 Q. Okay. So you don't know how this information
8 got into this form this way, correct?

9 A. No, I don't know.

10 Q. Okay. And you submitted this form, though,
11 correct?

12 A. Yes. I submitted through the online portal.

13 Q. Okay. And when you submitted through the
14 online portal, did it give you an opportunity to
15 review everything that you're about to submit before
16 you click the button to submit it?

17 A. No.

18 Q. No?

19 A. No, I don't remember completely, no.

20 Q. Okay. Let me ask you this: You see it says
21 Jun Zhang --

22 A. Uh-huh (affirmative).

23 Q. -- 100 percent owner. Was that true at the
24 time?

25 A. You're going back to -- Jun Zhang is my

JIAQI ZHANG

1 father, yes, he owns the Sichuan Singlida, but are
2 you asking if he owns 100 percent of XLD Group?
3 That's no.

4 Q. Okay. And, again, so this is not information
5 that you either put in the form or provided to --

6 A. No.

7 Q. -- the bank; is that correct?

8 A. No, I didn't. I didn't put this information.

9 Q. Okay. And you don't know where it came from,
10 correct?

11 A. No.

12 Q. When I say correct and you say no, that means
13 you're agreeing with me, right?

14 A. Okay, I didn't given this information.

15 Q. You didn't give information, and you don't
16 know where it came from, right?

17 A. No, I don't -- I don't know where it came
18 from.

19 Q. Okay.

20 A. You know, the no and yes is like really just
21 a grammar thing, it's really different from Mandarin,
22 so...

23 Q. Okay. Well, let me ask you this: In -- at
24 York, was there English classes?

25 A. I'm sure the university has English lessons

JIAQI ZHANG

1 class.

2 Q. Did you take English classes?

3 A. No.

4 Q. Did you take English classes in high school?

5 A. Yes.

6 Q. And how were your grades?

7 A. I think okay, average. I pass the extent.

8 Q. Okay. Let me ask you this: Turning to page
9 three, you see there's some bullet points at the top?

10 A. Uh-huh (affirmative).

11 Q. Does that mean yes?

12 A. Yes, yes, sorry.

13 Q. Okay. And you see the first bullet point, it
14 says, "I have read the statements included in this
15 form, and I understand them." Do you see that?

16 A. Yes.

17 Q. And did you read that at the time you
18 completed this form?

19 A. Yes.

20 Q. Okay. And then it says, "The applicant is
21 eligible to receive a loan under the rules in effect
22 at the time this application is submitted that it was
23 issued by the Small Business Administration and the
24 Department of the Treasury." Do you see that?

25 A. Yes.

JIAQI ZHANG

1 Q. And did you read that at the time?

2 A. Did I what? Sorry.

3 Q. Did you read that at the time?

4 A. Yes.

5 Q. Okay. And did you do anything to look up any
6 of those regulations to make sure that XLD Group and
7 XLD Century were eligible?

8 A. No.

9 Q. Okay. All right. Turning to Exhibit 3. I
10 guess you need me to screen share that?

11 MS. MOON: Which one.

12 MR. ABRAMS: Exhibit 3 is the XLD form for
13 Century.

14 MS. MOON: Okay. Just put it on the screen
15 then.

16 (Whereupon Plaintiff's Exhibit Z3, PPP
17 Application for XLD Century, LLC, was marked
18 for identification.)

19 BY MR. ABRAMS:

20 Q. Okay. So you see on the first page it says
21 your name, and then it says owner?

22 MS. MOON: Where? Where in the first page.

23 THE WITNESS: The same -- the same thing.

24 MS. MOON: The list of 20 percent or more?

25 /

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. You see that, ma'am?

3 A. Yes.

4 Q. And, again, that wasn't true, right?

5 A. I don't -- this one like not even have a
6 number on this one. I really don't know that.

7 Q. It's not true -- at the time in 2021, you
8 were not an owner of XLD Century LLC, correct?

9 A. Still not an owner.

10 Q. Okay, so that means yes?

11 A. What you mean, the facts? No, I'm not an
12 owner.

13 Q. Okay. I'm asking at the time you're not an
14 owner, correct?

15 A. Correct, that's correct.

16 Q. Okay. And, again, so you don't know where
17 this information came from saying that you were an
18 owner, correct?

19 A. I don't know, that's correct.

20 Q. Okay. But you signed this form, right?

21 A. Well, I don't recall if I sign or not this
22 one.

23 Q. Okay. All right, I just want to change gears
24 for a minute. I guess I have another document. I
25 guess I'll e-mail it to you, it's quite lengthy. I

JIAQI ZHANG

1 don't want to spend too much time on it, but hold on
2 a second.

3 MS. MOON: Can tell me what it is? Maybe I
4 have it.

5 MR. ABRAMS: No, you don't have it. What I
6 did during the break, I printed out -- you know,
7 Marriott's publicly traded, so I printed out like a
8 management agreement from the SEC website.

9 MS. MOON: Is that even relevant?

10 MR. ABRAMS: Look, ma'am, I mean you said it
11 in your papers that it was managed by Marriott.

12 MS. MOON: So how is it relevant in this case
13 whether it's managed or not? I don't understand.

14 THE WITNESS: It says for XLD Group.

15 MS. MOON: How is it relevant, counsel? I
16 mean I don't know response.

17 MR. ABRAMS: I'm not going to spend a lot of
18 time on this.

19 MS. Moon? I mean how many pages is it? I
20 don't know if I can download it if it's too long.

21 MR. ABRAMS: Well, the thing is -- yeah,
22 you'll be able to 'cause it's -- it was done, like,
23 from text so it's very -- it's just -- it's 675
24 kilobites so it's in fact shorter than the documents
25 you sent me. I just e-mailed it to you. I just have

JIAQI ZHANG

1 a few questions about it.

2 MS. MOON: I'm really not seeing the
3 relevance of this at all, it's simply a waste of
4 time, but if you have other questions, why don't you
5 ask those first or is this the end of your --

6 MR. ABRAMS: It's not -- I just want -- you
7 know, I just want to go in order, okay? It's Number
8 4.

9 MS. MOON: I still don't have it. Did you
10 say you sent it?

11 MR. ABRAMS: Yeah, I just e-mailed it to you.
12 (Whereupon Plaintiff's Exhibit Z4, Marriott
13 Management Agreement, was marked for
14 identification.)

15 BY MR. ABRAMS:

16 Q. Well, let me ask you this before we get into
17 it. Are you the one who signed management agreement
18 with Marriott Hotel Services or is that someone else
19 in the company?

20 A. I don't remember actually.

21 Q. All right. So I just want you to take a look
22 at this -- I'm just going to share it. I'm not going
23 to ask you a lot of questions. I just want to ask --

24 MS. MOON: I still don't have it.

25 MR. ABRAMS: All right, well, I'll just

JIAQI ZHANG

1 share.

2 MS. MOON: Okay.

3 BY MR. ABRAMS:

4 Q. All right. You see -- like this is from the
5 SEC website, this is Marriott Hotel Services
6 Management Agreement.

7 A. This is the second amendment to --

8 Q. Yeah, it's a lengthy agreement, obviously
9 we're not going to go through a hundred pages.

10 MS. MOON: Okay, thank you.

11 BY MR. ABRAMS:

12 Q. We're not going to do that. I just want to
13 ask you -- I'm just going to go to the very first
14 page, and you see it's an agreement between someone
15 in Marriott Hotel Services, and it basically says
16 that Marriott Hotel Services is going to manage the
17 hotel.

18 And I just want to know, does this -- are you
19 saying that XLD Century and XLD Group signed
20 documents like -- obviously not identical to this,
21 but something along these lines with Marriott Hotel
22 Services?

23 MS. MOON: Okay, you know what, why -- okay,
24 based on what you see, if you can answer, you can
25 answer, but I don't know what you're leading to.

JIAQI ZHANG

1 It's really not calculated to lead to any admissible
2 evidence.

3 I'm going to just have her answer this
4 question only, but if you have any other question
5 that's irrelevant such as this, I'm just going to ask
6 you to move on. Can you -- do you have the ability
7 to answer his question?

8 THE WITNESS: Well, we do have, like,
9 management agreement with Marriott and XLD Group and
10 XLD Century, but I don't know if it's this one, like,
11 you know, similar or we can --

12 MS. MOON: And the depo the last time. She's
13 not a computer, you know.

14 MR. ABRAMS: Okay. You know, ma'am, like
15 you're making comments, and it's totally
16 inappropriate. Like, you know, you have your witness
17 here, you have your objection. You know, I know what
18 you're doing, you're suggesting to her how she should
19 answer the question, and I really don't appreciate
20 it. Okay. I'm getting close to the point where I'm
21 going to call the magistrate.

22 MS. MOON: (Overtalk), counsel, each time
23 being just rude as you can be. That's how you
24 operate, clearly.

25 MR. ABRAMS: Yes, I'm very rude.

JIAQI ZHANG

1 MS. MOON: It's hard to say is this similar
2 to the agreement that she had. Why don't you ask
3 that on the interrogatories, that's more appropriate.
4 BY MR. ABRAMS:

5 Q. All right. Well, let's put the question a
6 different way. You know what, let me ask you this,
7 ma'am. Hold on a second.

8 Let me ask you this, ma'am. So when you went
9 through the application process, it wasn't your
10 intention to conceal the fact that XLD Group and XLD
11 Century were ultimately owned by PRC entity; is that
12 right?

13 A. Of course, no.

14 Q. You're saying of course, it's right or of
15 course, it's not right?

16 A. No, it's not right.

17 Q. And so -- okay. So it was your intention to
18 conceal the fact that --

19 MS. MOON: Oh, (unintelligible).

20 BY MR. ABRAMS:

21 Q. -- XLD Century and XLD Group are ultimately
22 owned by PRC entity; is that what you're testifying
23 to?

24 A. Well, you're just misunder -- you're just,
25 like, misinterpreting this. I said no, I don't -- I

JIAQI ZHANG

1 don't --

2 Q. Okay. Let me ask you this: I mean would it
3 help you if we got a Mandarin interpreter to help you
4 understand my questions, ma'am? But do you feel that
5 you're having difficulty understanding?

6 A. I understand. Do you have trouble to
7 understand me or --

8 MS. MOON: She said your questions -- she
9 said you're misunderstanding her. She said, of
10 course, no, but then why --

11 MR. ABRAMS: Ma'am, you're not allowed to do
12 this, okay? You're not allowed to answer for your
13 client. This is all being taken down, it's going to
14 come out at trial what you're --

15 MS. MOON: You're telling her she needs an
16 interpreter because she misunderstands your question.
17 She told you you're misunderstanding her answer. So
18 I'm just trying to straighten you out.

19 MR. ABRAMS: All right, ma'am, it's not your
20 job to straighten me out. You have a chance to cross
21 examine. You have a chance, at the end of this, to
22 clear up anything that you think needs to be cleared
23 up. It's not your turn to ask questions, ma'am. It
24 really isn't, and this is all going down, it's all
25 going to come out at trial.

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. Let me ask you this, ma'am. So just so we're
3 clear, you deny that you did anything -- you were
4 doing -- you had any intention of concealing the
5 ultimate PRC ownership of these two entities; is that
6 correct? Please just say yes or no.

7 A. Correct.

8 Q. Okay. Now, it's true that in applying for
9 these loans, you communicate -- the bank was Umpqua
10 Bank, right?

11 A. Yes.

12 Q. And you communicated with them by e-mail; is
13 that right?

14 A. Yes.

15 Q. All right. Hold on a second.

16 All right. I'm going to display what's being
17 marked as Exhibit 5.

18 (Whereupon Plaintiff's Exhibit Z5, e-mail,
19 was marked for identification.)

20 BY MR. ABRAMS:

21 Q. And I'm going to ask you if you recognize
22 this document?

23 A. Uh-huh (affirmative), yes.

24 Q. Okay. And what's this document?

25 A. That's the e-mail I sent to their PPP loan

Defendants
object to the
testimony from
here until
Page 73 on
substantially
the same grounds
as set forth
in the Parties'
Challenged
Exhibits Table

Plaintiff's
response is
substantially
the same as
set forth
the the Parties'
Challenged
Exhibits Table.
If the challenged
testimony
is admitted, then
Defendant
may introduce
the entire
bracketed
portions (both
blue and black)
with no
objection
from Plaintiff

JIAQI ZHANG

1 thing underwriter or -- yeah.

2 Q. And when you say "they", you're referring to
3 Umpqua Bank?

4 A. Umpqua, uh-huh (affirmative).

5 Q. Yes?

6 A. Yes.

7 Q. Okay. And are the contents of this e-mail
8 accurate and true?

9 A. Yes.

10 MS. MOON: What's the --

11 BY MR. ABRAMS:

12 Q. Okay. Well, let me ask you this, ma'am.

13 MS. MOON: Is there any other page or is this
14 it?

15 MR. ABRAMS: It's a one page document.

16 MS. MOON: Oh, okay.

17 BY MR. ABRAMS:

18 Q. So you see it says "Jun Zhang owns 100
19 percent of XLD Group N.A. Real Estate Development,
20 Inc."?

21 A. Uh-huh (affirmative).

22 Q. Yes?

23 A. Yes, yes.

24 Q. That's not true, is it?

25 A. Well, what do you mean that's not true?

JIAQI ZHANG

1 Q. Well, didn't you testify earlier that XLD
2 Group N.A. Real Estate Development, Inc. is owned by
3 XLD Top? An entity called XLD Top?

4 A. Yeah.

5 Q. Okay. So that's not true, is it?

6 A. It is true.

7 Q. Okay. At the time was -- was Jun Zhang the
8 owner of a 100 percent of XLD Group N.A. Real Estate
9 Development, Inc.?

10 A. It's asking for personal information.

11 Q. Okay. Well, let's see. Well, you see in the
12 -- in the blue is apparently the e-mail you were
13 responding to, do you see that?

14 A. Yeah.

15 Q. Okay. And did you read that blue?

16 A. Yes.

17 Q. Okay. And at the time you read that, what
18 was in the blue?

19 A. I don't remember.

20 Q. Well, you see it says, "If the ownership
21 structure involves multiple layers of corporations,
22 partnerships and/or trust, please provide a detailed
23 lineage of the ownership until it arrives at the
24 beneficial owners." Do you see do you see that?

25 A. Uh-huh (affirmative).

JIAQI ZHANG

1 Q. Does that mean yes or no?

2 A. I don't remember. Like I finished the whole
3 thing 'cause I -- she's asking for, like, personal
4 contact information, see a home address and phone
5 numbers and DOB, date of birth, so I just e-mail her.
6 I replied to them in my e-mail.

7 Q. You see it says if the owner -- the question
8 I asked you is this: Do you see that it says, "If
9 the ownership structure involves multiple layers of
10 corporations, partnerships and/or trust, please
11 provide a detailed lineage of the ownership until it
12 arrives at the beneficial owners." Do you see that?

13 A. I don't remember, like, I read the whole
14 thing 'cause she asked me questions, I just replied
15 her questions in e-mail. Sometimes people have like
16 signatures right, like, banks in the south. And I
17 don't -- I'm not sure if I go through the whole
18 thing, but I answered -- just answered her questions
19 to give, like, confirm the contact information.

20 Q. All right. Does that mean yes or no, ma'am?

21 A. I can't any -- well, I'm just like -- she's
22 asking for like personal information and date of
23 birth, and I -- and I just give her the home address
24 and phone numbers.

25 Q. All right. What's the question that I just

JIAQI ZHANG

1 asked you, ma'am?

2 A. What is your question?

3 Q. All right. Do you know the question that I
4 just asked of you?

5 A. You asked me a lot of questions, and I'm
6 just, like, saying I'm just replying my e-mail.

7 Q. Okay. Let me try a third time. I'll ask the
8 question a third time.

9 A. Maybe reask the question.

10 Q. Okay. Do you see in the blue where it says,
11 "If the ownership structure involves multiple layers
12 of corporations, partnerships and/or trust, please
13 provide a detailed lineage of the ownership until it
14 arrives at the beneficial owners."

15 I'm just asking if you see those words on the
16 paper, ma'am?

17 A. I see it now, yes.

18 Q. Okay. Are you testifying that at the time
19 you sent that e-mail you didn't see that?

20 A. I probably didn't go through the whole thing.
21 I told you, like, she e-mailed me the questions, and
22 I just answered the questions for the personal
23 information. Like she asked in the e-mail.

24 Q. Okay. So -- well, is it fair to say that
25 when you see things like this, you don't necessarily

JIAQI ZHANG

1 read them carefully?

2 A. Probably. Probably I didn't go through the
3 whole, like, the blue -- I don't remember, like,
4 really well, like from now, yeah.

5 Q. Okay. And is it fair to say that with
6 Exhibit 2 and Exhibit 3, the application forms, that
7 you didn't read those very carefully either?

8 A. No, you can't -- you can't -- that's a
9 different thing. You can't say that.

10 Q. Okay. So your testimony is that those you
11 read very carefully; is that right?

12 A. Yes.

13 Q. Okay.

14 By the way is that true that your father
15 resides in Bradbury, California?

16 A. Yes.

17 Q. Okay. Didn't you testify earlier that he
18 spends time in multiple places?

19 A. He has some different companies, yes.

20 Q. Well, I'm not asking about his companies, I'm
21 asking about where he resides, where he spends most
22 of his time. Is it your testimony that he spends
23 most of his time in Bradbury, California?

24 A. Well, he travels a lot, so -- it's like --

25 Q. All right. Well, does he have any sort of

JIAQI ZHANG

1 home base?

2 A. The address I give to you.

3 Q. Is that where (overtalk). He spends most of
4 his time in Bradbury, California?

5 A. I didn't really count, like calculate how
6 many days, you know, but, yeah, he does travel, and,
7 yeah. He stays, yeah. Yeah.

8 Q. Do you have a good relationship with him?

9 A. Is this related to this?

10 MS. MOON: Yes. I mean really? You don't
11 have to answer that.

12 MR. ABRAMS: Okay, we'll mark that for a
13 ruling.

14 MS. MOON: Really?

15 MR. ABRAMS: You can laugh at me. Yeah.

16 MS. MOON: Well, why don't you tell me what
17 the relevance is, okay?

18 MR. ABRAMS: Ma'am --

19 MS. MOON: Meet and confer before you make a
20 motion.

21 MR. ABRAMS: All right, all right, I will, I
22 will. I'm asking the question. If you want to tell
23 her not to answer, we'll give it another try.

24 BY MR. ABRAMS:

25 Q. Do you have a good relationship with your

JIAQI ZHANG

1 father, ma'am?

2 MS. MOON: No, I told you she doesn't have to
3 answer.

4 MR. ABRAMS: Fine.

5 MS. MOON: Well, you can tell me why it's
6 relevant.

7 MR. ABRAMS: We'll talk about it later,
8 there's no need to discuss it now.

9 MS. MOON: I mean you can answer that if
10 you -- yeah, go ahead. So we don't have to spend
11 time on --

12 THE WITNESS: Yeah, it's like father/daughter
13 relationship.

14 BY MR. ABRAMS:

15 Q. So are you able to tell me what residence he
16 spends the majority of his time at?

17 MS. MOON: Oh, my God, it's asked and
18 answered, counsel. Are you trying to harass her?
19 She already answered that question. Okay, move on.

20 MR. ABRAMS: Okay, so you're directing her
21 not to answer?

22 THE WITNESS: Well, he travels a lot, I told
23 you. When he comes to the United States, that's
24 where he stays.

25 /

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. So you're not able to tell me where in the
3 world he spends the majority of his time; is that
4 right?

5 A. I don't -- I don't calculate how many days he
6 stays. It's not just China or U.S., so he does
7 travel, like, to other business entities, so how can
8 I calculate how many days he spends like the most?
9 You know, I can't give you average, right? Like
10 sometimes he spends more time, like, in the United
11 States, sometimes he spends more time, like,
12 somewhere else. I don't have, like, ranking or --

13 Q. Okay. Were you ever the CFO of either of the
14 defendants?

15 A. Maybe in one of the document, yes.

16 Q. Okay. And when were you the CFO of either of
17 the defendants?

18 A. You mean when?

19 Q. Yeah.

20 A. I don't remember exactly the dates, but --

21 Q. Well, as we talk right now, are you the CFO
22 of either defendant?

23 A. Yes.

24 Q. Okay. Both?

25 A. For both, yes.

JIAQI ZHANG

1 Q. And how long have you been the CFO?

2 A. Yeah, I don't remember exactly.

3 Q. Okay. And just so we're clear, CFO stands
4 for Chief Financial Officer, right?

5 A. Yes.

6 Q. Okay.

7 MR. ABRAMS: I need a break. I'm very close
8 the being done. I need a break of about fifteen
9 minutes, okay? So can we come back, we'll let's say
10 at 12:07, is that okay?

11 MS. MOON: 12:07 Pacific time.

12 MR. ABRAMS: Yes, that's fifteen minutes from
13 now.

14 MS. MOON: That's fine.

15 MR. ABRAMS: Okay.

16 (Whereupon a short break was taken.)

17 BY MR. ABRAMS:

18 Q. So, ma'am, is there any of your prior
19 testimony that you want to change or correct?

20 A. No.

21 Q. Okay. And we're very close to being done.
22 I'm going to show you what is Exhibit 6.

23 (Whereupon Plaintiff's Exhibit Z6,
24 Certificate of Completion, was marked for
25 identification.)

JIAQI ZHANG

1 BY MR. ABRAMS:

2 Q. Can you see that?

3 A. Yes.

4 Q. Okay. And do you see that there's a -- like
5 a signature in, like, it would appear to be Chinese
6 characters on this document?

7 A. Yes.

8 Q. And whose signature is that?

9 A. Yeah, that's my signature.

10 Q. Okay. And do you understand that this is a
11 document that's from Umpqua Bank?

12 A. Yes.

13 Q. Okay. So do you understand that this means,
14 at least according to Umpqua Bank, you signed the PPP
15 documents in 2021?

16 MS. MOON: It's a loan approval, it doesn't
17 say it's application.

18 THE WITNESS: It's a loan document.

19 BY MR. ABRAMS:

20 Q. All right, ma'am.

21 A. Yes.

22 Q. I'm just asking you so this -- well, let me
23 ask you this: Does this document refresh your
24 recollection as to whether you signed anything in
25 connection with the PPP loans we've been discussing?

JIAQI ZHANG

1 A. Yeah, like I signed something from the photo,
2 but, yeah, I don't -- I don't remember, like, if it's
3 this one.

4 Q. Okay. So you don't remember -- you know you
5 signed something, but you don't remember what it was,
6 is that what you're testifying to?

7 A. Yeah, I don't remember exactly like what
8 documents, you know, the signature page or -- but I
9 do. I did sign something.

10 Q. All right. And let me just make sure I
11 understand what you're saying, okay? Just kind of
12 sum up your position.

13 If I understand you correctly, you're saying
14 that at the time you applied for these two second
15 draw PPP loans, you were aware that the two companies
16 that received the loans were ultimately owned by of a
17 PRC company --

18 A. Uh-huh (affirmative).

19 Q. -- however, the certification you initialed
20 that we discussed, you were confident that it applied
21 to subsidiaries of the applicant and not to parent
22 companies. Does that adequately summarize your
23 position?

24 A. Yeah, correct.

25 Q. Okay.

JIAQI ZHANG

1 A. You know, the fact -- the fact is that our
2 companies are owned by Chinese entity is a public
3 information. You know, our company doesn't own any
4 Chinese companies. I heard of it, it was like in the
5 news media, it's all over the internet. You can find
6 it everywhere.

7 And our companies are California entities,
8 you know, with California employees. And what do we
9 do is, like, for their benefits and for the hotel,
10 like, which operates here. You know --

11 Q. And --

12 A. So any at the time of the acquisition,
13 there's a lot of places local government and local
14 officers and the mayor, the L.A. County and the
15 Chinese Council all came to our celebrations for the
16 hotel acquisitions. You can find us, like, in the
17 news also. It's not a -- it's like all public
18 information, so I'm not trying to hide anything.

19 Q. I see. And you're just as confident, as you
20 sit here today, of your interpretation of Exhibit 2
21 and Exhibit 3; is that right?

22 A. It's my understanding, yeah.

23 MS. MOON: Don't say Exhibit 2 or Exhibit 3,
24 just tell me -- you already asked this question many,
25 many times, but please, just specify what you're

JIAQI ZHANG

1 trying to say. Don't say Exhibit 2 or Exhibit 3.

2 MR. ABRAMS: All right, ma'am, if she doesn't
3 understand, what I'm talking about, she can tell me,
4 okay. You know when you -- at trial if you try to
5 coach her like this, it's not going to go so well.

6 MS. MOON: Why do you say every time I say
7 it's coaching? You are not doing your job properly.
8 You're not phrasing your questions. You're asking
9 her the same questions over and over hoping for some
10 different answers, okay.

11 MR. ABRAMS: Okay.

12 BY MR. ABRAMS:

13 Q. So, ma'am, do you understand that Exhibit 2
14 and Exhibit 3 are the two application forms for the
15 second draw PPP loans we've been discussing?

16 A. Yes.

17 Q. Okay. And my question is -- my question is,
18 and you're just as confident today as you were when
19 you initialed those forms of your interpretation; is
20 that right?

21 MS. MOON: Objection, it's not calculated to
22 lead to admissible evidence. What she feels about it
23 today, it doesn't matter, okay?

24 MR. ABRAMS: Are you directing her not to
25 answer?

JIAQI ZHANG

1 MS. MOON: You don't need to answer that.

2 MR. ABRAMS: You're directing her --
3 (overtalk).

4 MS. MOON: She already answered it anyway,
5 but --

6 MR. ABRAMS: We'll mark that for a ruling.

7 MS. MOON: It's not relevant.

8 MR. ABRAMS: We'll put down and mark that for
9 ruling.

10 MS. MOON: Fine, fine.

11 MR. ABRAMS: All right. I don't have anymore
12 questions at this time. Cross examination?

13 MS. MOON: No.

14 MR. ABRAMS: Before -- wait, wait. Before I
15 should say that -- I should say I'm not closing this
16 because there's been a few instructions of the
17 deponent not to answer, so we may have to reopen
18 this, but I don't have anymore questions today.

19 MS. MOON: That's fine.

20 MR. ABRAMS: No cross examination.

21 MS. MOON: No.

22 MR. ABRAMS: Okay. Disconnecting.

23 MS. MOON: Thank you.


24 (Where the deposition was stopped at 12:15
25 p.m.)

JIAQI ZHANG

PENALTY OF PERJURY

I do declare under penalty of perjury under
the laws of the State of California that the
foregoing is my deposition under oath; are the
questions asked of me and my answers thereof; that I
have read same and have made the necessary
corrections, additions or changes to my answers that
I deem necessary.

In witness whereof I subscribe my name on
this day of 13th, December, 2023.



JIAQI ZHANG

CORRECTIONS: JIAQUI (BECKY) ZHANG DEPOSITION TRANSCRIPT 12/1/23

1. Page 9, line 13: Please change "2000—2010" to "2010."
2. Page 11, line 18: please delete "yeah" after "so I - - ."
3. Page 13, line 9: Please delete "states" after "Real Estate."
4. Page 19, line 18: Please delete "In Canada."
5. Page 30, line 1: please change "withdrew" to "went through."
6. Page 33, line 10: Please change "stations" to "statements."
7. Page 35, line 15: Please change "host" to "hold."
8. Page 35, line 22: Please change "or" to "of."
9. Page 42, line 4: Please change "I did" to "that was"
10. Page 60, line 7: Please change "extent" to "exam."
11. Page 72, line 13: Please change "I don't remember, like, I read the whole thing"
To "I don't remember that, like, I read the whole thing."
12. Page 80, line 1: Please change "photo" to "computer."
13. Page 81, line 1: Please change "the fact is that" to "the fact that."
14. Page 81, line 12: Please change "So any at the time of the acquisition" to "So at
the time of the acquisition."

ID #:963

CERTIFICATE OF REPORTER

I, YVONNE M. HARGROVE, a Certified Shorthand Reporter of the State of California, do hereby certify:

That I was present at the taking of the deposition of JIAQI ZHANG, administered the oath to her, and thereafter correctly took down in machine shorthand all of the testimony given and proceedings had;

That I thereafter caused my said shorthand notes to be reduced to typewriting, and that the foregoing transcript constitutes a full, true and correct record of such testimony given and proceedings had.

I further certify that I am not of counsel or attorney for any of the parties, nor am I in any way interested in the outcome of said cause.

IN WITNESS WHEREOF, I have hereunto subscribed my signature on this 6th day of December, 2023.


YVONNE M. HARGROVE, CSR No. 3354
Certified Shorthand Reporter

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